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July 10, 2013

Via ECF

Honorable Steven C. Mannion, U.S.M.J.
United States District Court
District of New Jersey
M.L. King, Jr. Federal Bldg.
50 Walnut Street
Newark, NJ 07102

Re: North Jersey Surgery Center v. United Parcel Service
Civil Action No.: 2:12-cv-07003-ES-CLW
Status Letter

Dear Judge Mannion:

Please be advised this office represents the Plaintiff in the above-referenced matter. There is a telephone conference for this matter scheduled before Your Honor on July 17, 2013. The parties jointly submit this letter to advise Your Honor of the status of this matter in anticipation of the aforementioned telephone conference.

The parties are continuing to exchange written discovery and discuss a potential settlement. Defendant United Parcel Service of America, Inc. ("UPSOA"), improperly pleaded as "United Parcel Service," received plaintiff's discovery responses today and will need additional time to review and consider additional discovery if necessary. The parties jointly request a thirty-day extension of the discovery end date, the first extension request made by either party in this matter. UPSOA would also request the right to file a dispositive motion following the completion of discovery.

We thank Your Honor for your time and consideration.

Respectfully,



ANDREW R. BRONSNIK, ESQ.

cc: Kevin Skelly, Esq. (Via ECF)